

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORIES
(APWU/USPS-3 THROUGH 8)**

The United States Postal Service hereby files institutional responses to the above-identified interrogatories of the American Postal Workers Union, dated January 27, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 9, 2012

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-3 Has anyone at USPS evaluated the combined impact on customer service of the proposed closings resulting from network rationalization combined with the impacts on customer service from instituting the proposed changes from Docket No. N2010-1, Six-Day to Five-Day Street Delivery and Related Changes? If so, please identify, by name and title, who within the Postal Service conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusions

RESPONSE

No. But see the response to APWU/USPS-5.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-4 Has anyone at USPS evaluated combined impact on customer service of the proposed closings resulting from network rationalization combined with the impacts on customer service from instituting the proposed changes from Docket No. N2011-1, Retail Optimization Initiative, 2011. If so, please identify, by name and title, who within the Postal Service conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusions.

RESPONSE

No. But see the response to APWU/USPS-5.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-5 Has anyone at USPS conducted analysis of the potential combined revenue losses and other impacts resulting from instituting all the proposed changes in Docket Nos. N2010-1, N2011-1, and N2012-1? If so, please identify, by name and title, who within the Postal Service, conducted this evaluation and describe the analysis, summarize its results and provide all documents related to this evaluation and conclusions.

RESPONSE

To the extent any such research or analysis has been undertaken, see the response to DFC/USPS-T12-9, which also points to library references USPS-LR-N2012-1/70 and USPS-LR-N2012-1/NP14. That research was abandoned before completion, with the result that no analysis of its preliminary quantitative results was pursued. The quantitative research addressed and analyzed by witnesses Elmore-Yalch (USPS-T-11) and Whiteman (USPS-T-12) was pursued instead.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-6 Has anyone at USPS conducted analysis of the impact of the proposed changes in this docket and corresponding service standard changes and the exigent rate increase sought in R2010-4? If so, please identify, by name and title, who within the Postal Service conducted this analysis, describe the analysis, summarize its results and provide all documents related to this analysis and conclusions.

RESPONSE

No. But see the response to APWU/USPS-5.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

APWU/USPS-7 Assuming the PRC does not issue its decision in this case until August 2012, will the Postal Service implement the Mail Processing Network Rationalize Service Changes Plan before receiving the benefit of the Commission's advisory opinion in this docket?

RESPONSE

Please see the response to APWU/USPS-T1-20.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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APWU/USPS-8 If the Postal Service determines not to move forward with its Mail Processing Network Rationalization proposal which is the subject of this docket, does the Postal Service intend to implement the Service Standard changes which are the subject of the Federal Register Notice published December 15, 2011 at 76 *Federal Register* 77942?

RESPONSE

Please see the response to APWU/USPS-T1-19.